

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,

*Plaintiff,*

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,  
*Defendant.*

Case No. 1:17-mc-151-LPS

**SIEMENS ENERGY, INC.'S JOINDER TO GOLD RESERVE'S  
MOTION TO STRIKE SPECIAL MASTER'S NOTICE OF SUPERIOR PROPOSAL**

Siemens Energy, Inc. ("SEI") hereby joins Gold Reserve's *Motion to Strike the Special Master's Notice of Superior Proposal*, dated August 27, 2025 (D.I. 2117) (the "Motion"). As the Motion conclusively establishes, the *Notice of Special Master's Determination of Superior Proposal*, dated August 25, 20205 (D.I. 2113), contradicts the plain language of the bidder protections and is irreconcilable with the clear and unambiguous language of prior orders of this Court. For the reasons set forth in the Motion, the Notice should be stricken.

SEI reserves all rights in connection with the Motion and the Notice, including the right to appear and be heard on any issue relating to any of the foregoing.

Dated: August 27, 2025

Of Counsel:

Francisco Rivero (*Pro Hac Vice*)  
Arturo Munoz Holguin (*Pro Hac Vice*)  
1221 McKinney Street  
Suite 2100  
Houston, TX 77010  
Tel: (713) 469-3800  
frivero@reedsmith.com  
amunoz@reedsmith.com

Respectfully submitted,

/s/ Justin M. Forcier  
Justin M. Forcier (No. 6155)  
**REED SMITH LLP**  
1201 N. Market Street, Suite 1500  
Wilmington, DE 19801  
Tel: (302) 778-7500  
Fax: (302) 778-7575  
jforcier@reedsmith.com